

MORRIS LAW GROUP

900 BANK OF AMERICA PLAZA • 300 SOUTH FOURTH STREET • LAS VEGAS, NEVADA 89101
702/474-9400 • FAX 702/474-9422

MORRIS LAW GROUP
Robert McCoy, No. 9121
Email: rrm@morrislawgroup.com
Joni A. Jamison, No. 11614
Email: jaj@morrislawgroup.com
900 Bank of America Plaza
300 South Fourth Street
Las Vegas, Nevada 89101
Telephone: (702) 474-9400
Facsimile: (702) 474-9422

Attorneys for Defendant
DePuy Orthopaedics, Inc.

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

HERMAN AZEFOR,)	Case No. 2:15-cv-00192-MMD-GWF
)	
Plaintiff,)	
)	
vs.)	
)	STIPULATION AND
DEPUY ORTHOPAEDICS, INC.,)	ORDER TO STAY RESPONSE
DEPUY PRODUCTS, INC., DEPUY)	TO COMPLAINT AND
INTERNATIONAL LIMITED,)	DISCOVERY
JOHNSON & JOHNSON,)	
JOHNSON & JOHNSON)	(FIRST REQUEST)
SERVICES, INC.,)	
)	
Defendants.)	

The parties stipulate and request that the Court enter an order staying the following deadlines pending the resolution of defendant DePuy Orthopaedics, Inc.'s ("DePuy") Motion to Dismiss (#19):

1. The deadline for the remaining defendants to respond to Plaintiff's Complaint (#1); and
2. All deadlines and requirements imposed by Fed. R. Civ. P. 26(f) and LR 26-1, including but not limited to filing a joint discovery plan and scheduling order.

MORRIS LAW GROUP
 900 BANK OF AMERICA PLAZA • 300 SOUTH FOURTH STREET • LAS VEGAS, NEVADA 89101
 702/474-9400 • FAX 702/474-9422

This is the first continuance sought in connection with these deadlines. To potentially reduce the costs associated with this litigation, the parties do not wish to engage in additional pleadings, motion practice, or discovery until the Court has ruled on the statute of limitations issue presented in DePuy's motion.

The parties further stipulate that nothing in this stipulation waives any defenses or potential defenses that could be raised. If the Court denies DePuy's motion to dismiss, the parties agree that the remaining defendants who have been served at the time that the Court issues its ruling shall have 21 days after the Court issues its ruling on the motion to dismiss to file their responses to Plaintiff's Complaint. The parties will then have 30 days thereafter to file their joint discovery plan and proposed scheduling order pursuant to Fed. R. Civ. P. 26(f) and LR 26-1.

RICHARD HARRIS LAW FIRM

MORRIS LAW GROUP

By: /s/ Douglas A. Dellaccio
 Richard Harris, No. 505
 801 South Fourth Street
 Las Vegas, Nevada 89101

By: /s/ Joni A. Jamison
 Robert McCoy, No. 9121
 Joni A. Jamison, No. 11614
 900 Bank of America Plaza
 300 South Fourth Street
 Las Vegas, Nevada 89101

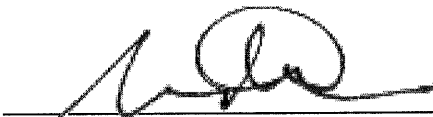
CORY WATSON, P.C.
 Douglas A. Dellaccio (*pro hac vice*)
 Richard A Wright (*pro hac vice*)
 2131 Magnolia Avenue
 Suite 200
 Birmingham, Alabama 35205

Attorneys for Defendant
 DePuy Orthopaedics, Inc.

Attorneys for Plaintiff

IT IS SO ORDERED.

ORDER


 MIRANDA M. DU
 UNITED STATES DISTRICT JUDGE
 DATED THIS 1st day of April 2015